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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

Case No.: 3:25-cv-03070-JD

**DECLARATION OF CLAUDIA  
WALLACE MOORE**

**DECLARATION OF CLAUDIA WALLACE MOORE**

I, Claudia Wallace Moore, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am employed by the United States Department of Veterans Affairs and have 54 years of government service at the Coatesville VA Medical Center (Coatesville VAMC) in Coatesville, Pennsylvania.

3. I have served as a local official of the National Association of Government Employees (NAGE), Local R3-35 (NAGE, R3-35) Coatesville VAMC, since 1994. I am also a NAGE National Vice President and serve on the NAGE National Veterans Affairs Bargaining Team.

4. NAGE represents approximately 600 non-professional employees, including but not limited to groundskeepers, engineering, housekeeping staff, food service, medical support assistants, health technicians, and licensed practical nurses who report to the Coatesville VAMC. NAGE also represents approximately 45 professional bargaining unit employee physicians who report to the Coatesville VAMC.

5. Coatesville VAMC Registered Nurses (RNs) are represented by the Teamsters Local Union 115.

6. RNs are part of a multidisciplinary team that provides direct and indirect care to veterans. The work is highly collaborative and depends on constant communication and coordination among various job classifications, including NAGE bargaining unit employees such as Licensed Practical Nurses (LPNs), health technicians, nursing assistants (NAs), physicians, medical support assistants (MSAs), housekeeping staff, engineering staff, food service workers, and more.

7. Licensed Practical Nurses (LPNs) assist with bedside care, administer medications, take vital signs, and perform wound care under the supervision of RNs and

1 physicians. RNs delegate tasks to LPNs consistent with their scope of practice, and LPNs update  
2 RNs on patients' conditions.

3 8. Health Technicians and Nursing Assistants provide essential support with daily  
4 living activities, such as bathing, toileting, ambulation, and feeding. They monitor patient  
5 conditions and promptly report changes to RNs, who assess and escalate care when needed.

6 9. Physicians rely on RNs to monitor patients' progress, administer prescribed  
7 treatments, and carry out care plans. RNs act as intermediaries between patients and physicians,  
8 often communicating concerns, status changes, or clarifying orders.

9 10. Medical Support Assistants (MSAs) manage scheduling, patient check-in,  
10 recordkeeping, and other administrative support functions. RNs often coordinate with MSAs to  
11 ensure accurate documentation, timely appointments, and the availability of medical records.

12 11. Housekeeping staff maintain a clean and safe environment for patients, staff, and  
13 visitors. While not involved in direct patient care, their work is crucial to infection control and  
14 patient comfort. RNs coordinate with housekeeping to ensure that rooms are cleaned promptly,  
15 particularly for room turnover related to new admissions or discharges.

16 12. Engineering staff address physical plant issues such as temperature control,  
17 lighting, bed operation, or call bell systems. RNs report issues that affect patient care or safety,  
18 and engineering staff respond accordingly.

19 13. Food service workers deliver meals to patients based on dietary orders. RNs  
20 communicate with dietary staff regarding patients' special needs, such as food allergies, tube  
21 feedings, or swallowing precautions.

22 14. Medical Support Assistants (MSAs) manage scheduling, patient check-in,  
23 recordkeeping, and other administrative support functions. RNs often coordinate with MSAs to  
24 ensure accurate documentation, timely appointments, and the availability of medical records.

25 15. The effective delivery of care at the VA Medical Center depends on mutual  
26 respect and coordinated workflow across all of these roles. Each position contributes to the care  
27

1 and well-being of our veteran patients, and teamwork is essential to ensure safe and efficient  
2 operations.

3 16. Care team members, including physicians, RNs, LPNs, NAs, health technicians,  
4 and MSAs, have role-based access to patients' electronic medical records through the VA's  
5 electronic health record system. This access allows appropriate team members to review and  
6 document clinical assessments, vital signs, medication administration, physician orders, lab  
7 results, dietary needs, and care plans. Shared access ensures continuity of care, promotes timely  
8 interventions, and supports interdisciplinary communication. Access is governed by strict VA  
9 policies to maintain patient confidentiality and comply with HIPAA and other federal privacy  
10 laws.

11 17. In my experience, shared access to patient records is essential for ensuring patient  
12 safety, avoiding duplication or error, and facilitating real-time collaboration among caregivers  
13 and support staff as detailed above.

14 18. All employees mentioned above, RNs, LPNs, NAs, health technicians, physicians,  
15 MSAs, housekeeping, engineering, and food service staff are employed by Coatesville VAMC  
16 and work under the same overarching organizational structure.

17 19. Many employees share overlapping chains of command, often reporting to  
18 common unit supervisors, service chiefs, or associate directors, all of whom ultimately report to  
19 the hospital director. The NAGE and Teamsters Local Union 115 bargaining unit are serviced by  
20 the same Human Resources office and Labor Relations department, which administer personnel  
21 policies, labor agreements, and employee relations for all departments and occupational groups  
22 at the facility.

23 20. I am aware that the March 27, 2025 Executive Order titled "Exclusions from  
24 Federal Labor Management Relations Programs" ("Exclusion Order") excluded workers at the  
25 Coatesville VAMC from federal sector labor law.

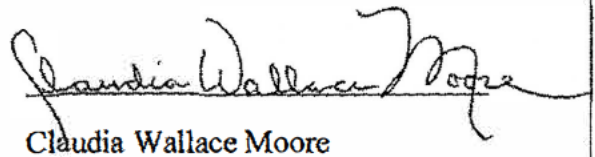
26 21. I am aware that in a notice published in the Federal Register on April 17, 2025  
27 titled "Order Suspending the Application of Section 1-402 or 1-404 of Executive Order 12171,"

1 the VA has suspended the application of the Exclusion Order to employees represented by  
2 Teamsters Local Union 115 at Coatesville VAMC.

3 22. NAGE bargaining unit employees, who report to the Coatesville VAMC remain  
4 covered by the Exclusion Order.

5 23. As a result, payroll deductions for voluntary union dues have stopped for  
6 members of NAGE at Coatesville VAMC. I am aware that payroll deductions for voluntary  
7 union dues continue for members of Teamsters Local Union 115.

8 I declare under penalty of perjury under the laws of the United States that the foregoing is  
9 true and correct. Executed April 25, 2025, in Coatesville, Pennsylvania

10  
11   
12 Claudia Wallace Moore